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DISTRICT OF NEVADA	
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACK WILLIAM MORGAN, and

SAMUEL BROWN,

Defendants.

CRIMINAL INDICTMENT

Case No.: 2:17-cr- 64

VIOLATIONS:

18 U.S.C. § 1201(c) – Conspiracy to Commit
Kidnapping;
18 U.S.C. § 1201(a)(1) – Kidnapping; and
18 U.S.C. § 2 – Aiding and Abetting

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Commit Kidnapping)

Beginning from a time unknown, and continuing up to and including January 31,
2017, in the State and Federal District of Nevada and elsewhere,

**JACK WILLIAM MORGAN, and
SAMUEL BROWN**

defendants herein, and others known and unknown to the grand jury, did knowingly and
intentionally combine, conspire, and agree with each other and with individuals known and

1 unknown, to unlawfully kidnap and abduct JJP and hold her for ransom, reward, or otherwise,
2 and willfully transport her in interstate commerce from the State and District of Nevada to the
3 State and District of New Mexico.

4 **Overt Acts**

5 In furtherance of the conspiracy and to effect the objects of the conspiracy, the following
6 overt acts, among others, were committed in the District of Nevada and elsewhere:

7 1. On or about January 30, 2017, in the District of Nevada, the defendants Jack
8 William Morgan and Samuel Brown, kidnapped and abducted J.J.P., and transported her from
9 the State and District of Nevada to the State and District of New Mexico.

10 2. On or about January 30, 2017, the defendants Jack William Morgan and Samuel
11 Brown, used physical force and violence in order to kidnap J.J.P. and forcibly put J.J.P. in a
12 vehicle and fled the area.

13 3. On or about January 30, 2017, the defendants Jack William Morgan and Samuel
14 Brown chained J.J.P. to the floor of a vehicle while they transported her from the State and
15 District of Nevada to the State and District of New Mexico.

16 4. On or about January 30, 2017, the defendants Jack William Morgan and Samuel
17 Brown kidnaped and abducted J.J.P. transported her from the State and District of Nevada to the
18 State and District of New Mexico for the purpose of inflicting physical harm on her.

19 All in violation of Title 18, United States Code, Section 1201(c).
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COUNT TWO
(Kidnapping)

On or about January 30, 2017, in the State and Federal District of Nevada and elsewhere,

JACK WILLIAM MORGAN, and
SAMUEL BROWN

defendants herein, aiding and abetting one another, did unlawfully kidnap and abduct J.J.P., and hold her for ransom, reward, and otherwise and did willfully transport her in interstate commerce from the State and District of Nevada to the State and District of New Mexico, in violation of Title 18, United States Code, Sections 1201(a)(1), and 2.

DATED: this 22nd day of February, 2017

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney



SUSAN CUSHMAN
Assistant United States Attorney